UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HOE XUAN NGUYEN,

Plaintiff,

v.

ING FINANCIAL ADVISERS, LLC, NORTHERN LIFE INSURANCE (RELIASTAR FINANCIAL / ING CORP.),

Defendants.

NO.

DECLARATION OF SHERYL J. WILLERT IN SUPPORT OF DEFENDANT'S NOTICE OF REMOVAL

I, Sheryl J. Willert, say:

- I am one of attorneys representing Defendant ING Financial Advisors, LLC, a
 Delaware limited partnership. I am over 18 years of age, have personal knowledge of the
 matters stated herein, and am competent to testify.
- 2. In the event that service is achieved on Northern Life Insurance or Reliastar Financial, these parties have no objection to removing.

DECLARATION OF SHERYL J. WILLERT IN SUPPORT OF DEFENDANT'S NOTICE OF REMOVAL- 1

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1	2. Attached and incorporated herein are true and correct copies of the following
2	documents:
3	Exhibit A: True and correct copy of the Summons
4	Exhibit B: True and correct copy of the Complaint.
5	Exhibit C: True and correct copy of the Order Setting Civil Case
6	Schedule
7	Exhibit D: True and correct copy of Defendant's Notice of
8	Appearance.
9	The foregoing statement is made under penalty of perjury under the laws of the State of
10	Washington and is true and correct.
11	Signed at Seattle, Washington this 28th day of May, 2004.
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13	Theres Sheryl J. Willert
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